

William Banks
Foamex, L.P.
3005 Commercial Road
Fort Wayne, Indiana 46809

Re: 003-12211-00225
First Administrative Amendment to
Part 70 003-7680-00225

Dear Mr. Banks:

Foamex, L.P. was issued a permit on March 22, 1999 for a stationary plant that manufactures polyurethane foam. An application for a preconstruction approval and an approval to operate was received on April 17, 2000. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

The administrative amendment consists of incorporating the new operation conditions for the proposed increase in the foam processing rate of the existing permitted one (1) 6 sheet felt press C (ID No. FPC), from 211,000 sheets per year to 300,000 sheets per year; and the installation of one (1) new 6 sheet felt press D (ID No. FPD), with a foam processing rate of 300,000 sheets per year, permitted under the Minor Source Modification No. 003-12178-00225.

Section D.6 of the issued Part 70 Permit T003-7680, issued on March 22, 1999, is revised to incorporate the operation condition of the above source modification. Revision is as follows (changes are bolded and deletions are struck through for emphasis):

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (5) one (1) 4 sheet felt press (ID No. FPA), pressing a maximum of 131,400 sheets per year, exhausting through one (1) stack (ID No. 47); and
- (6) ~~one (1) 6 sheet felt press (ID No. FPC), pressing a maximum of 211,000 sheets per year, exhausting through one (1) stack (ID No. 48).~~
Increase the foam processing rate of the existing one (1) 6 sheet felt press C (ID No. FPC), from 211,000 sheets per year to 300,000 sheets per year exhausting through one (1) stack (ID No. 48); and
- (7) **The installation of one (1) new 6 sheet felt press D (ID No. FPD), with a foam processing rate of 300,000 sheets per year, exhausting through one (1) stack (ID No. 49).**

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Volatile Organic Compounds (VOCs) [326 IAC 2-1]

Any change or modification ~~that would lead to an increase in allowable emissions which may increase the potential to emit VOC, PM and PM10~~ greater than exempt levels, as specified in 326 IAC 2-1, based on the stack test results, ~~emission factor of 1.02 lbs VOC per hour at maximum capacity~~ shall be subject to New Source Review and must be approved by the Office of Air Management (OAM) before such change can occur.

D.6.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the PM emission from the following felt presses shall be limited as follows:

~~Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the 4 sheet felt press (ID No. FPA) and the 6 sheet felt press (ID No. FPC) shall not exceed 1.95 and 2.58 pounds per hour, respectively, when operating at process weight rates of 660 and 1000 pounds per hour, respectively.~~

Facility	Process Weight Rate (ton/hr)	PM Emissions Limit (lb/hr)
Felt Press A (ID: FPA)	0.33	1.95
Felt Press C (ID: FPC)	0.71	3.25
Felt Press D (ID: FPD),	0.71	3.25

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where: } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 4.10 (0.33)^{0.67}$$

$$E = 1.95 \text{ pounds per hour} = 8.5 \text{ tons per year}$$

and

$$E = 4.10 (0.5)^{0.67}$$

$$E = 2.58 \text{ pounds per hour} = 11.3 \text{ tons per year}$$

Compliance Determination Requirement

The testing requirements for the modification will follow the testing schedule in the Part 70 permit T033-7680-00225.

D.6.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the period between 24 and 36 months after issuance of this **original Part 70** permit, the Permittee shall perform PM, **PM10** and VOC testing, to verify the PM, **PM10** and VOC emissions from these facilities, utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM/**PM10**, and methods as approved by the Commissioner for VOC. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6.4 Record Keeping Requirements

- (a) The Permittee shall maintain records in accordance with (1) through (3 **4**) below for the thermal reticulation unit. Records maintained for (1) through (3 **4**) shall be taken monthly and shall be complete and sufficient to establish compliance with Condition D.6.1.
- (1) The number of polyurethane sheets processed;
 - (2) **The weight of the polyurethane foam processed;**
 - (3) A log of the dates of use; and
 - (4) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact **Aida De Guzman**, at (800) 451-6027, press 0 and ask for (reviewers name) or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

APD

cc: File - Allen County
U.S. EPA, Region V
Allen County Health Department
Air Compliance Section Inspector - Jennifer Dorn
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Foamex, L.P.
3005 Commercial Road
Fort Wayne, Indiana 46809**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T003-7680-00225	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: March 22, 1999
1 st Administrative Amendment No.: AA003-12211-00225	Pages Affected: 5, 6, 38 & 39
Issued by: Paul Dubenetzky, Chief Permit Branch Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary polyurethane foam production and foam processing plant.

Responsible Official: William Banks
Source Address: 3005 Commercial Road, Fort Wayne, Indiana 46809
Mailing Address: 3005 Commercial Road, Fort Wayne, Indiana 46809
SIC Code: 3086
County Location: Allen
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) one (1) natural gas flame laminator machine (ID No. FL-02), with a maximum capacity of 40,000 square feet per hour, and exhausting through one (1) stack (ID No. 02-002);
- (2) one (1) polyurethane foam manufacturing process (ID No. PLC-01), producing a maximum of nine (9) million board feet per day of polyurethane foam, consisting of:
 - (a) two (2) mix chambers;
 - (b) one (1) periphlex pour line, exhausting through ten (10) stacks (ID Nos. 1-5, 9-12, and 19);
 - (c) one (1) ester pour line, exhausting through six (6) stacks (ID Nos. 21-26);
 - (d) three (3) foam bun storage areas (Carpet Underlay Mezzanine Bun Grabber Area, South Finishing Mezzanine Bun Grabber Area, and the Loaf Stacker Area), exhausting through fourteen (14) stacks (ID Nos. 13-15, 17, 18, 20, 27-33, and 49);
- (3) one (1) thermal reticulation unit (ID No. TRU-01), processing a maximum of 10 cycles of polyurethane foam buns per hour, at a maximum volume of 244,296 cubic inches of foam per cycle, exhausting through ten (10) stacks (ID Nos. 35-44);
- (4) two (2) natural gas fired boilers (ID Nos. IPB-01 and IPB-02), each rated at 12.6 million (MM) British thermal units (Btu) per hour, using No. 2 distillate fuel oil as back-up fuel, and each exhausting through one (1) stack (ID Nos. 45 and 46);
- (5) one (1) 4 sheet felt press (ID No. FPA), pressing a maximum of 131,400 sheets per year, exhausting through one (1) stack (ID No. 47); and
- (6) Increase in the foam processing rate of the existing one (1) 6 sheet felt press C (ID No.

FPC), from 211,000 sheets per year to 300,000 sheets per year, exhausting through one (1) stack (ID No. 48).

- (7) The installation of one (1) new 6 sheet felt press D (ID No. FPD), with a foam processing rate of 300,000 sheets per year, exhausting through one (1) stack (ID No. 49).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) polyol storage tanks with VOC emissions less than 3 pounds per hour or 15 pounds per day (one tank has a storage capacity of 30,000 gallons); and
- (2) one (1) 20,000 gallon No. 2 fuel oil storage tank with VOC emissions less than 3 pounds per hour or 15 pounds per day.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (5) one (1) 4 sheet felt press (ID No. FPA), pressing a maximum of 131,400 sheets per year, exhausting through one (1) stack (ID No. 47); and
- (6) Increase in the foam processing rate of the existing one (1) 6 sheet felt press C (ID No. FPC), from 211,000 sheets per year to 300,000 sheets per year, exhausting through one (1) stack (ID No. 48).
- (7) The installation of one (1) new 6 sheet felt press D (ID No. FPD), with a foam processing rate of 300,000 sheets per year, exhausting through one (1) stack (ID No. 49).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Volatile Organic Compounds (VOCs) [326 IAC 2-1]

Any change or modification which may increase the potential to emit VOC, PM and PM-10 greater than exempt levels, as specified in 326 IAC 2-1, based on the stack test results, shall be subject to New Source Review and must be approved by the Office of Air Management (OAM) before such change can occur.

D.6.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the PM emissions from the following felt presses shall be limited as follows:

Facility	Process Weight Rate (ton/hr)	PM Emissions Limit (lb/hr)
Felt Press A (ID: FPA)	0.33	1.95
Felt Press C (ID: FPC)	0.71	3.25
Felt Press D (ID: FPD),	0.71	3.25

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirement

D.6.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the period between 24 and 36 months after issuance of the original Part 70 permit, the Permittee shall perform PM, PM10 and VOC testing, to verify the PM, PM10 and VOC emissions from these facilities, utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM/PM10, and methods as approved by the Commissioner for VOC. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6.4 Record Keeping Requirements

- (a) The Permittee shall maintain records in accordance with (1) through (4) below for the thermal reticulation unit. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with Condition D.6.1.
 - (1) The number of polyurethane sheets processed;
 - (2) The weight of the polyurethane foam processed;
 - (3) A log of the dates of use; and
 - (4) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.